

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

IN THE MATTER OF THE SEARCH OF  
INFORMATION ASSOCIATED WITH  
FACEBOOK ACCOUNT NUMBER  
100003816944565 THAT IS STORED AT  
PREMISES CONTROLLED BY  
FACEBOOK INC.

Case No. 7:21mj121

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Andrew Burton, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information associated with Facebook Account Number **100003816944565** that is stored at premises owned, maintained, controlled, or operated by Facebook Inc. (“Facebook”), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the Account Number.

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) and have worked in this capacity since March of 2020. I am currently assigned to the Roanoke Field Office, Washington Field Division. Prior to my employment with the ATF, I was employed as a Secret Service Uniformed Division Officer for 5 years. As an ATF Special Agent, I have received training and experience regarding investigations

involving firearms and narcotics trafficking and the possession of firearms by prohibited persons. As a result of my training and experience, I have learned methods commonly used by narcotics and firearms traffickers to engage in unlawful activity. I am familiar with evidence that is frequently indicative of narcotics trafficking, unlawful firearms possession and firearms trafficking.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 922(a)(6), and 18 U.S.C § 922(a)(1)(A) have been committed by Sedale YOUNG. There is also probable cause to search the information described in Attachment A for evidence of these crimes and contraband or fruits of these crimes, as described in Attachment B.

#### **PROBABLE CAUSE**

#### **CASE INITIATION**

5. In October 2019, ATF submitted a query to the Firearms Transaction Center (FTC) of the Virginia State Police, seeking records of firearm transaction approvals for Sedale YOUNG based on purchaser background checks. Records received from the FTC in response to this inquiry reflected numerous firearms purchase approvals for YOUNG over an eight-month period between February and October 2019. Each such approval was linked to purchases from various Federal Firearms Licensees (FFL).

**SUMMARY OF INTELLIGENCE CONCERNING  
FIREARM PURCHASES AND RECOVERIES**

6. Based on these reports, multiple sales reports, and firearms trace summaries, ATF obtained Form 4473 Firearms Transaction Reports for YOUNG's purchases. According to the reports listed above, YOUNG purchased approximately sixty-nine (69) firearms between February 2, 2019, and October 19, 2019 as follows:

February 2, 2019:	Hi-point, Model JHP, .45 caliber, SN: X4313139
March 24, 2019:	Smith & Wesson, Model SD40VE, .40 caliber, SN: FBD2590 Taurus, Model G2C, 9mm, SN: TLX74988
April 06, 2019:	Smith & Wesson, Model SD40, .40 caliber, SN: FBD2590 <sup>1</sup>
May 10, 2019:	Glock, Model 27, .40 caliber, SN: DMX331
May 18, 2019:	Taurus, Model G2C, 9mm, SN: TMD33615
May 31, 2019:	Taurus, Model G2C, 9mm, SN: TLY14861 SCCY, Model CPX-2, 9mm, SN: 749276
June 04, 2019:	Taurus Model G2C, 9mm, SN: TMA96973
June 08, 2019:	Taurus, Model G2C, 9mm, SN: TMB70258
June 15, 2019:	Taurus, Model G2C, 9mm, SN: TLY02164 Cobra Firearms, Model CEN380, .380 caliber, SN: K25999
July 05, 2019:	Bond Arms, Backup, .45 caliber, SN: 170985
July 24, 2019:	Taurus, Model G2C, 9mm, SN: TMR19788
August 1, 2019:	Smith & Wesson, Model SD40, .40 caliber, SN: FBL5400 Smith & Wesson, Model SD40, .40 caliber, SN: FBL1787
August 7, 2019:	Taurus, Model G2C, .40 caliber, SN: SMR37310

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<sup>1</sup> This April 6, 2019 transaction of the same firearm purchased by YOUNG on March 24, 2019 was a pawn redemption, resulting in a separate Form 4473.

August 11, 2019: Smith & Wesson, Model SD40VE, .40 caliber, SN: EBJ8638  
Smith & Wesson, Model SD40, .40 caliber, SN: FBB1605

August 13, 2019: Ruger, Model EC9, 9mm, SN: 456-02501

August 15, 2019: Taurus, Model G2C, 9mm, SN: TMR20478

August 17, 2019: Smith & Wesson, Model SD40VE, .40 caliber, SN: FBJ5596  
Smith & Wesson, Model SD40, .40 caliber, SN: FBD2824  
Springfield Arms, Model XDS, .45 caliber, SN: HGIZ0898

August 18, 2019: FN Herstal, Model Five-Seven, 5.7mm, SN: 3X6366841  
Sig Sauer, Model P320, .40 caliber, SN: 58A016675  
Sig Sauer, Model P320, .40 caliber, SN: 58B182391  
Del-Ton, Model DTI-15, .556 caliber, SN: DTI-5188796  
Taurus, Model G2C, 9mm, SN: TMS71197

August 21, 2019: Taurus, Model G2C, 9mm, SN: TMS52084  
Taurus, Model G2C, .40 caliber, SN: SMR37257

August 27, 2019: Taurus, Model G2C, 9mm, SN: TMR29508  
Taurus, Model G2C, 9mm, SN: TMR27031  
Taurus, Model G2C, 9mm, SN: TMR29676  
Taurus, Model G2C, 9mm, SN: TMR29467  
Taurus, Model G2C, 9mm, SN: TMR29708  
Taurus, Model G2C, .40 caliber, SN: SMR37191  
Taurus, Model G2C, .40 caliber, SN: SMR37493

August 29, 2019: Smith & Wesson, Model SD40, .40 caliber, SN: FBL7380  
Smith & Wesson, Model SD40, .40 caliber, SN: FBL7334  
Taurus, Model G2C, .40 caliber, SN: SMR41510  
Taurus, Model G2C, 9mm, SN: TMR29486  
Taurus, Model G2C, .40 caliber, SN: SMR41602

September 2, 2019: Taurus, Model G2C, 9mm, SN: TMR29725  
SCCY, Model CPX-2, 9mm, SN: 792971  
SCCY, Model CPX-2, 9mm, SN: 780856  
Del-ton, Model DTI-15, .556, SN: DTIS188794

September 3, 2019: Taurus, Model G2C, .40 caliber, SN: SMR37609

September 8, 2019: Del-ton, Model DTI-15, .556 caliber, SN: DTI-5188792  
Taurus, Model G2C, 9mm, SN: TMT51427

September 13, 2019: Glock, Model 23, .40 caliber, SN: BLFE271  
Glock, Model 23, .40 caliber, SN: BLFE287  
Glock, Model 23, .40 caliber, SN: BLFE369

September 26, 2019: Taurus, Model G2C, .40 caliber, SN: SMR11565  
Taurus, Model G2C, .40 caliber, SN: SMR11573  
Taurus, Model G2C, .40 caliber, SN: SMR11575  
Taurus, Model G2C, .40 caliber, SN: SMR36760  
Taurus, Model G2C, .40 caliber, SN: SMR11732  
Taurus, Model G2C, .40 caliber, SN: SMR37739  
Taurus, Model G2C, .40 caliber, SN: SMR37676  
Taurus, Model G2C, .40 caliber, SN: SMR11731  
Taurus, Model G2C, .40 caliber, SN: TMS43355  
Taurus, Model G2C, 9mm, SN: TMS43516

September 27, 2019: Glock, Model 27, .40 caliber, SN: BKLD736  
SCCY, Model CPX-2, 9mm, SN: 829581  
Taurus, Model G2C, 9mm, SN: TMT50519

October 5, 2019: SCCY, Model CPX-2, 9mm, SN: 360878  
SCCY, Model CPX-2, 9mm, SN: 822450

October 19, 2019 Taurus, Model G2C, 9mm, SN: TMT46815  
Taurus, Model 603, .357 caliber, SN: MC59610

7. ATF began investigating YOUNG for suspected straw purchasing and engaging in the business of dealing in firearms without a federal firearms license, in violation of 18 U.S.C. §§ 922(a)(6) and 922(a)(1)(A).

8. Your affiant knows from training and experience that it is common for straw purchasers to purchase multiple firearms of the same make and model in a short period of time. For example, between August 21, 2019, and September 27, 2019, YOUNG purchased twenty-six (26) Taurus, Model G2C semi-automatic pistols in either .40 caliber or 9mm, eight of which have been recovered by law enforcement in connection with criminal activity.

9. A number of firearms purchased by YOUNG have been recovered from crime scenes and from individuals suspected of criminal activity. Firearm trace summaries and

corresponding police reports indicate that 21 firearms purchased by YOUNG were recovered by law enforcement between September 5, 2019 and March 22, 2021, in connection with criminal investigations in several states between Virginia and New York:

- September 5, 2019: SCCY, Model CPX-2, 9mm, SN: 792971  
SCCY, Model CPX-2, 9mm, SN: 780856  
Taurus, Model G2C, 9mm, SN: TMR29708  
Taurus, Model G2C, 9mm, SN: TMR29486  
*Recovered in Waldorf, Maryland, by the Charles County Sheriff's Office with assistance by the ATF Baltimore Field Division*
- October 9, 2019: FN Herstal, Model Five-Seven, 5.7mm, SN: 3X6366841  
*Recovered in Washington, DC by ATF Washington Field Office*
- October 17, 2019: Taurus, Model G2C, 9mm, SN: TMB70258  
*Recovered in Roanoke, Virginia, by the Roanoke City Police*
- October 26, 2019: Smith & Wesson, Model SD40VE, .40 caliber, SN: EBJ8638  
*Recovered in Washington, DC, by the DC Metropolitan Police*
- October 27, 2019: Taurus, Model G2C, .40 caliber, SN: SMR37257  
*Recovered in Washington, DC, by the DC Metropolitan Police*
- October 30, 2019: Glock, Model 23, .40 caliber, SN: BLFE369  
*Recovered in Greenbelt, Maryland, by the Prince George's County Police*
- November 22, 2019: Taurus, Model G2C, 9mm, SN: TMR29508<sup>2</sup>  
*Recovered in Suitland, Maryland, by the Prince George's County Police*
- December 4, 2019: Taurus, Model G2C, 9mm, SN: TMR20478  
*Recovered in Brooklyn, New York, by the New York City Police*

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<sup>2</sup> Incorrectly described in trace recovery as Model PT111 G2A; the corresponding Form 4473 shows it is a Model G2C.

December 18, 2019: Taurus, Model G2C, .40 caliber, SN: SMR41602  
*Recovered in Washington, DC, by the DC Metropolitan Police*

December 23, 2019: Taurus, Model G2C, 9mm, Serial Number: TMA96973<sup>3</sup>  
*Recovered in Hyattsville, Maryland, by the Prince George's County Police*

February 2, 2020: Taurus, Model G2C, 9mm, SN: TLY14861  
*Recovered in Norfolk, Virginia, by the Norfolk Police*

February 20, 2020: Taurus, Model G2C, .40 caliber, SN: SMR11732  
*Recovered in Morningside, Maryland, by the Prince George's County Police*

November 10, 2020: Taurus, Model G2C, .40 caliber, SN: SMR41510  
*Recovered in Mechanicsville, MD by Maryland State Police*

December 01, 2020: Smith & Wesson, Model SD40, .40 caliber, SN: FBL1787  
*Recovered in Washington, DC by DC Metropolitan Police*

August 27, 2020: Smith & Wesson, Model SD40, .40 caliber, SN: FBL5400  
*Recovered in Washington, DC by DC Metropolitan Police*

February 05, 2021: Taurus, Model G2C, .40 caliber, SN: SMR11573  
*Recovered in Washington, DC by DC Metropolitan Police*

March 16, 2021: Smith & Wesson, Model SD40, .40 caliber, SN: FBJ5596  
*Recovered in Washington, DC by DC Metropolitan Police*

March 22, 2021: Glock, Model 27, .40 caliber, SN: BKLD736  
*Recovered in Oxon Hill, MD by Prince George's County Police*

10. Several of these firearms were recovered within days of YOUNG's purchase.

For example, four firearms were recovered by police in Waldorf, Maryland on September 5, 2019, were found in new condition in the original manufacturer's box. These firearms had

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<sup>3</sup> Incorrectly described in trace recovery as Model PT111 G2A; the corresponding Form 4473 shows it is a Model G2C.

been purchased by YOUNG in Roanoke, Virginia on three separate occasions just before they were recovered in Maryland—August 27, 2019, September 2, 2019, and September 3, 2019.

11. During a voluntary interview with investigators conducted at YOUNG's residence in November, 2019, YOUNG insisted that he still possessed each of the firearms he had purchased and claimed to be storing them in multiple locations. YOUNG ultimately terminated the interview and invoked his right to counsel.

**SUMMARY OF INTELLIGENCE OBTAINED FROM YOUNG'S CELL PHONE**

12. I know from my training and experience that individuals engaged in illegal firearms trafficking frequently use text, voice calls, and social media applications such as Facebook to communicate and further their criminal activities.

13. Specifically, individuals use such electronic applications and social media to coordinate the purchase, sale, transport, and transfer of firearms, and to collect proceeds from illicit sales, maintaining frequent contact with customers and their sources of supply.

14. On April 30, 2020, ATF secured a federal warrant to search and seize YOUNG's cellular device assigned call number (540) 519-3890. Text messages between YOUNG and others reveal YOUNG was knowingly involved in firearms trafficking.

15. For example, a text exchange between YOUNG and phone number (540) 519-7404, believed to be associated with an individual J.D.,<sup>4</sup> documents a request made to YOUNG from J.D. for 10 Taurus model G2C's:

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<sup>4</sup> J.D. is a convicted felon.

<u>Date</u>	<u>Young</u>	<u>J.D.</u>
September 22, 2019		"I need 10 G2's for both of them."
	"Copy!!"	...
September 23, 2019		...
	...	...
	...	...
	...	...
	...	...
	...	...
	...	...
	...	...
	...	...
September 24, 2019		"Aye did you talk to Walt?"
September 25, 2019	"No didn't get chance too" "No answer they might be closed already"	
September 26, 2019	"You on point for this morning?" "8909" "1,087.79" "I only came up with a lil 20 so far, timing off my peoples don't get off til later the 4" "Bet"	"Ok" "I got 1020" "Stand by" "My wife's gonna give us 50"

Form 4473 records show YOUNG purchased 10 Taurus, Model G2Cs from Walter Warner at Southwest Virginia Arms on September 26, 2019.

16. In two text messages sent to another phone number from YOUNG's device, he states: "Bet I'll let you know if I need you, I'm bout to leave the gun selling alone shit

dangerous AF lol" and "I got in some trouble with selling guns, these dudes is on my ass about me owing them some guns."

17. In addition, social media data files in YOUNG's phone contained two types of Facebook chats—private messages, which included correspondence between two accounts, and group chats, which only contained the account names of the participants and the title of the group chat.

18. The content of the private messages reveals that YOUNG was using Facebook chat as a resource to market and sell firearms. For example, in one private message YOUNG states: "300 for G2" (believed to refer to a \$300 Taurus, model G2C) and "I got one .357" (believed to refer to a .357 caliber firearm).

19. The cell phone extraction indicates that YOUNG's Facebook user name is Sedale Young and is associated with account number 100003816944565.

20. Investigators also identified a group chat titled "Guns, Gear and Tech," involving YOUNG and approximately 11 other user accounts. The device extraction did not contain the content of these group chats.

21. One of those other user accounts interfacing with YOUNG through the "Guns, Gear and Tech" group chat was identified by investigators in approximately May, 2021, to be Christopher JOHNSON, a target of a related firearms trafficking investigation. JOHNSON's suspected Facebook account number (100009006058858) is associated with both private messages with YOUNG as well as the "Guns, Gear and Tech" group chat, which shows the last activity of April 23, 2020. JOHNSON's phone number (540) 815-9169 is also associated with text message communications with YOUNG concerning firearms. For example, one text reads: "Any 40s you wanna let go?" Another reads: "You still tryna let go that glock?"

22. Given YOUNG's use of Facebook chats to discuss and market firearms, there is probable cause to believe that the "Guns, Gear and Tech" Facebook chat group will contain further evidence of the criminal activity described herein.

23. On or about May 20, 2021, your affiant requested that Facebook preserve the data held within YOUNG's Facebook account for a period of 90 days.

FACEBOOK INC.

24. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

25. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

26. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each

Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

27. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

28. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages, attachments, and links that will typically be visible to anyone who can view the user's profile.

29. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It

also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

30. Facebook users can exchange private messages on Facebook with other users. Those messages are stored by Facebook unless deleted by the user. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a chat feature that allows users to send and receive instant messages through Facebook Messenger. These chat communications are stored in the chat history for the account. Facebook also has Video and Voice Calling features, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

31. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

32. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (i.e., non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

33. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

34. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.

35. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

36. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications ("apps") on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

37. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

38. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some

cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

39. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user's IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events

relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to “tag” their location in posts and Facebook “friends” to locate each other. This geographic and timeline information may tend to either inculpate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner’s state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

40. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

#### **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

41. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

## CONCLUSION

42. Based on the foregoing information, your affiant requests that the Court issue the proposed search warrant.

43. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Facebook. Because the warrant will be served on Facebook, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

44. This court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated as defined by 18 U.S.C. § 2711(3)(A)(i).

## REQUEST FOR SEALING

45. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

Respectfully submitted,

  
\_\_\_\_\_  
Andrew Burton  
Special Agent  
Bureau of Alcohol Tobacco and Firearms

Subscribed and sworn to me August 19, 2021

Robert S. Ballou  
UNITED STATES MAGISTRATE JUDGE